



February 23, 2012  
**Via ECFS Filing**

Ms. Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

RE: Unitel Global LLC  
EB Docket No. 06-36; 2011

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2011 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of Unitel Global LLC.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3031 or via email to [stthomas@tminc.com](mailto:stthomas@tminc.com). Thank you for your assistance in this matter.

Sincerely,

/s/Sharon Thomas

Sharon Thomas  
Consultant to Unitel Global LLC

cc: Flavia Ferrero, Unitel Global  
file: Unitel Global - FCC - Other  
tms: FCx1201

Enclosures  
ST/im

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification:	Covering calendar year 2011
Name of company(s) covered by this certification:	Unitel Global, LLC
Form 499 Filer ID:	825568
Name of signatory:	Flavia Ferrero
Title of signatory:	President

1. I, Flavia Ferrero, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. §64.2001 *et seq.*
2. Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in §64.2001 *et seq.* of the Commission's rules.
3. The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
4. The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.
5. The company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

  
\_\_\_\_\_  
Flavia Ferrero, President

2-16-2012  
\_\_\_\_\_  
Date

**Attachments:**      Accompanying Statement explaining CPNI procedures

**Attachment A**  
**Statement of CPNI Procedures and Compliance**

## **Unitel Global, LLC**

### **Statement of CPNI Procedures and Compliance**

Unitel Global, LLC (“Unitel” or “the Company”) does not use or permit access to CPNI to market any telecommunications or non-telecommunications services. Unitel has trained its personnel not to use CPNI for marketing purposes. Should the Company elect to use CPNI in future marketing efforts, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

Unitel has processes in place to safeguard its customers’ CPNI from improper use or disclosure by employees and to discover and protect against attempts by third parties to gain unauthorized access to customer CPNI. Specifically, the Company has stringent network security in place that restricts access to customer data at multiple levels. Employees are able to access various levels of information based on their particular job responsibilities. Customer information resides on secure servers behind firewalls. Employees are trained regarding the Company procedures for safeguarding CPNI, and the Company has disciplinary processes in place in the event an employee violates company procedures.

Unitel maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.

The Company has instituted authentication procedures to safeguard the disclosure of call detail over the telephone. Customers are issued a password upon account creation, when their identity can be readily authenticated. Passwords do not rely on readily available biographical information or account information. If the customer is unable to provide the appropriate password, Unitel will not disclose call detail over the telephone in response to a customer-initiated inquiry, unless the customer can provide the call detail information that is the subject of the inquiry without the assistance of a customer service representative.

Unitel has established back-up authentication procedures for lost or forgotten passwords that do not prompt the customer for readily available biographical information or account information. These back-up authentication procedures rely on the use of secret questions. If a customer cannot provide a correct password or respond to the secret questions, they must establish a new password in order to obtain call detail information over the telephone in response to a customer-initiated inquiry. Alternatively, the Company will provide the requested call detail by calling the customer back at his/or telephone number of record or by sending the information to the customer’s address of record.

Unitel immediately notifies customers via email to a pre-established email address of record, by mail to the address of record, or by telephone call to the telephone number of record whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, or address of record is created or changed without revealing the changed information or sending the notification to the new account information.

The Company does not disclose CPNI on-line. If it elects to do so in the future, it will follow the applicable rules set forth in 47 CFR Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical information or account information and customer notification of account changes.

Unitel does not have any retail locations and therefore does not disclose CPNI in-store.

The Company has procedures in place to notify law enforcement in the event of a breach of customers' CPNI and to ensure that customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement. While it has not had any breaches to report, it has a process for maintaining records of all breaches discovered and notifications made to the USSS and the FBI, and to customers.

Unitel has not taken any actions against data brokers in the last year.

The Company did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2011.

Unitel has not developed any information with respect to the processes pretexters are using to attempt to access CPNI.

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